

**COMMONWEALTH OF MASSACHUSETTS
BEFORE THE
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Investigation by the Department of)	
Telecommunications and Energy on its own)	D.T.E. 01-106
motion into increasing the penetration rate for)	
discounted electric, gas and telephone service.)	
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**COMMENTS OF
WESTERN MASSACHUSETTS ELECTRIC COMPANY**

I. Background

On December 17, 2001, the Department of Telecommunications and Energy (“Department”) issued an Order opening a Notice of Inquiry to investigate increasing the penetration rate for discounted electric, gas and telephone service. Western Massachusetts Electric Company (“WMECO”) submitted comments to the seven questions set out by the Department in its December 17th Order on January 24, 2002. On July 16, 2002, the Department held a meeting which established working groups to identify issues and recommend proposals. WMECO representatives participated in those working groups and those groups submitted recommendations to the Department on September 17, 2002. On October 31, 2002, the Department issued a request for comments to two questions pertaining to the working groups’ recommendations. WMECO respectfully submits the following comments to the Department’s two questions.

II. WMECO's Comments

1. The working groups recommended the use of a check box, similar to that used by fuel assistance agencies, for new applicants to the Department of Transitional Assistance ("DTA") and the Division of Medical Assistance ("DMA"), granting the agencies authorization to release eligibility information to utilities. As an alternative to the use of a check box, please comment on whether it would be more effective to require applicants to authorize the release of eligibility information as a condition to applying for public benefit programs. What additional procedures, if any, should be addressed by the Department in this investigation?

The use of a check box, similar to that used by fuel assistance agencies, for new applicants of the DTA and the DMA, granting the agencies authorization to release eligibility information to utilities would be beneficial. This change would facilitate the verification process by eliminating privacy concerns. In addition, the implementation of this procedure may eliminate the need for a central entity to gather this information.

WMECO has no opinion on whether it would be more effective to require applicants to authorize the release of eligibility information as a condition to applying for public benefit programs. WMECO is not knowledgeable enough about the requirements of public benefit program eligibility to form an opinion on making this a condition for program applicants.

WMECO has not identified any additional procedures that should be addressed by the Department in this investigation.

2. Evaluate the costs and benefits of moving to a model where a central entity gathers relevant information from Community Action Programs /grantees and government agencies (DTA, DMA, etc.) on eligible customers for the discount rate and shares this information with utilities. In addition, the Department is considering the possibility of utilizing MassCARES, a technology based initiative of the Massachusetts Executive Office of Health and Human Services. Please discuss whether MassCARES would be a feasible Central Information Storehouse for an automated matching program for the discount rate.

As stated above, the implementation of a check box by DTA and DMA may eliminate the need for a central entity to gather relevant information on eligible customers for sharing with the utilities. If the Community Action Programs and government agencies all adopt the check box approach, relevant information will be provided to the utilities without the added expense of a central, data-gathering entity. WMECO favors the check-box approach because it should achieve the goal of increasing eligible-customer enrollment without the substantial expense of a central, data-gathering entity.

WMECO has reviewed the information on MassCares found at www.masscares.org. There is not sufficient information available for WMECO to conclude that MassCARES would be a feasible Central Information Storehouse for an automated matching program for the discount rate.

III. Conclusion

The implementation of a check-box system by all agencies should be pursued as the next step. WMECO believes this system has the potential to be efficient and cost-effective. It certainly should be pursued before undertaking the development of a central, data-gathering entity. It is WMECO's opinion that the check box would be more cost-effective than other approaches.

WMECO appreciates the opportunity to submit these comments.